BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 01-0662

Direct Testimony of Chris Nations
On Behalf of Ameritech Illinois

Ameritech Illinois Exhibit 9.0

PUBLIC VERSION

January 28, 2002

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1   **DIRECT TESTIMONY OF CHRIS NATIONS**

2   **ON BEHALF OF AMERITECH ILLINOIS**

3

4   **I.**   **INTRODUCTION AND PURPOSE OF TESTIMONY**

5   **Q.**   **Please state your name, title, and business address.**

6   A.   My name is Chris Nations. I am Area Manager – Regulatory –Operator Services. My

7   business address is One SBC Plaza, Room 3440.13, Dallas, Texas 75202.

8
9   **Q.**   **Please describe your current job responsibilities?**
10
11   A.   In this position, I am responsible for representing Ameritech Illinois' Operator Services

12   organization before regulatory bodies and other external stakeholders. I also assist these

13   organizations in meeting all legal and regulatory requirements relating to Operator and

14   Directory Assistance Services provided by Ameritech Illinois.

15
16   **Q.**   **Please describe your background.**
17
18   A.   I attended the University of Central Arkansas in Conway, Arkansas, where I earned a BA

19   degree in Mass Communications and Marketing in 1994. While working for the

20   Company, I have attended a number of seminars and other training sponsored by SBC

21   Communications, Inc. ("SBC"), and other industry organizations on various management

22   subjects. I began my career with SBC in 1996. I have held account management and

23   product management positions in Southwestern Bell Wireless and Southwestern Bell

24   Telephone. From May 2000 to January 2002, I was employed by SBC Telecom, SBC's

25   out-region CLEC subsidiary. During that time I was responsible for SBC Telecom's

26   interconnection agreements with ILECs outside the SBC operating territory. I began my

27   current assignment as Area Manager – Regulatory - Operator Services, February 1, 2002.

28

29   **Q.**   **What is the purpose of your testimony?**

30   A.   The purpose of my testimony is to demonstrate that Ameritech Illinois is in compliance

31   with the requirements to provide nondiscriminatory access to directory assistance

32   services to allow the other carrier's customers to obtain telephone numbers, operator call

33   completion services as required by sections 251(b)(3) and 271(c)(2)(B)(vii)(II) and (III)

34   of the Federal Telecommunications Act of 1996 ("Act"). A detailed discussion of the

35   Company's compliance is contained in my affidavit, attached as Schedule CN-1 to my

36   testimony. I will also address certain issues relating to my affidavit which arose during

37   industry workshops held in this proceeding.

38

39   **II.**   **BRANDING OF OPERATOR AND DIRECTORY ASSISTANCE SERVICES**

40   **Q.**   **During industry workshops in this proceeding certain parties complained that it**

41   **takes five business days from the time a customer has migrated its service to a**

42   **CLEC before the customer's OS/DA service is properly branded in the CLEC's**

43   **name. As an initial matter can you explain what is branding for Operator and**

44   **Directory Assistance services?**

45   A.   As explained in more detail in paragraph 25 of my initial affidavit attached as Schedule

46   CN-1, Ameritech Illinois provides the capability to brand CLEC subscribers' OS/DA

47   calls in the CLEC's name, before the call is answered by an operator, when the CLEC

48   chooses Ameritech Illinois to provide those wholesale services. Thus, when a CLEC

49   subscriber dials "zero" for operator services or "411" for directory assistance, the caller

50   will hear the name of his or her local exchange carrier, if the CLEC has subscribed to

51   Ameritech Illinois' wholesale branding service. This branding capability is identical to

52   branding Ameritech Illinois provides to itself for its retail subscribers.

53

54 **Q:**   **Can you explain how Ameritech Illinois brands OS/DA calls in the name of a CLEC,**

55   **even though Ameritech Illinois' own operators handle the call?**

56 **A.**   As I detailed in paragraph 25 of my initial affidavit attached as Schedule CN-1,

57   Ameritech Illinois offers to brand CLEC subscribers' OS and DA calls with the name of

58   their local exchange provider. The ability to brand CLEC subscribers' calls with CLEC-

59   specific names is provided both to switch-based carriers as well as resale and UNE-based

60   CLECs using Ameritech Illinois' unbundled local switching. Ameritech Illinois brands

61   CLEC subscribers' calls with CLEC-specific information, in the same manner that it

62   brands its own subscribers' calls. Ameritech Illinois uses the same 271-compliant

63   process used by Southwestern Bell Telephone ("SWBT") and approved by the FCC in

64   271 proceedings for Texas, Kansas, Oklahoma, Missouri and Arkansas. As noted in my

65   affidavit, when a switch-based CLEC selects Ameritech Illinois to provide wholesale OS

66   and/or DA services on the CLEC's behalf, calls initiated by the CLEC's subscriber are

67   routed to Ameritech Illinois' operator platform via dedicated trunks. Branding of OS and

68   DA calls coming to Ameritech Illinois' operator switch via dedicated trunks has long

69   been available.

70

70   Q.   **Is branding of OS/DA services also available on CLECs' resale and UNE-P OS/DA**

71   **calls coming to Ameritech Illinois over shared trunks?**

72   A.   Yes. In 2000,[1] Ameritech Illinois deployed the capability to provide CLEC-specific

73   branding of OS and DA calls for CLECs that compete by reselling Ameritech Illinois'

74   service, or by obtaining access to Ameritech Illinois' unbundled network elements. OS

75   and DA calls from resale and UNE-based CLECs' subscribers arrive at Ameritech

76   Illinois' operator platform from Ameritech Illinois' end office (dial tone) switches via

77   shared trunks, just as Ameritech Illinois' retail subscribers calls are routed. Ameritech

78   Illinois deployed technology that would allow the operator platform to determine which

79   local exchange carrier served a specific subscriber when an OS or DA call arrived at the

80   Ameritech Illinois operator switch from a shared trunk.

81

82   Q.   **How do you respond to comments that it takes five business days from the time a**

83   **customer has migrated its service to the CLEC before the customer's OS/DA service**

84   **is branded in the new local exchange carrier's name?**

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[1] Accessible Letter CLECAM00-074, issued August 1, 2000, details the capability that
Ameritech Illinois developed and deployed to brand a CLEC's OS/DA calls that come to
Ameritech Illinois's platform over shared trunks (i.e. calls that originate on Ameritech Illinois's
end office switches and are routed to Ameritech Illinois's operator platform on the same trunks
as calls from Ameritech Illinois's retail customers).

85   A.   The concern about a possible five-day interval to change branding is based on old

86   information and is no longer relevant. In the fourth quarter 2001, Ameritech Illinois

87   further refined its OS/DA branding capability to utilize information in the Line

88   Information Database ("LIDB") to trigger OS/DA branding. Ameritech Illinois utilizes

89   LIDB's Originating Line Number Screening ("OLNS") capability to determine which

90   local exchange carrier serves the caller -- a change that is transparent to CLECs as well as

91   Ameritech Illinois' subscribers. Ameritech Illinois is utilizing OLNS to obtain carrier-

92   specific designation for OS/DA calls from Ameritech Illinois and CLEC subscribers

93   whose calls are routed from Ameritech Illinois's end office switches to Ameritech

94   Illinois's operator platform.[2] Whatever the interval between migration and changes in

95   carrier-specific branding, however, the CLEC concerns are of no competitive

96   significance. OS/DA branding changes triggered by a subscriber's migration from one

97   local exchange carrier to another are the same for Ameritech Illinois subscribers and

98   CLEC subscribers.

99

100 Q.   **Is this OS/DA branding process any different from when a subscriber migrates local**

101   **exchange service from a CLEC to Ameritech Illinois?**

---

[2]   Prior to the recent refinement of the OS/DA branding process, the possible interval to change
branding was up to five days using a table populated with per-subscriber-line carrier information.
However, the interval generally was much shorter. Since the table update was downstream from
the migration process, there was a period of time before a subscriber's carrier OS and DA
branding was changed to its new local service provider. This was as true for Ameritech to CLEC
migrations as it was for CLEC to Ameritech migrations. Now Ameritech's operator platform
obtains carrier-specific information from the LIDB database to trigger OS/DA branding. LIDB
is updated more quickly than the table initially utilized to trigger OS/DA branding.

102   A.   No, the process is the same, implemented in the same timeframe. With information from

103   LIDB that is specific to which local exchange carrier serves the calling telephone line,

104   Ameritech Illinois' operator switch "plays" the CLEC-specific or Ameritech Illinois

105   brand.[3] Thus, subscribers of resale and UNE-based CLECs' local exchange service, as

106   well as Ameritech Illinois' retail subscribers, can hear their carrier-specific brands after

107   dialing "zero" for operator services or "411" for directory assistance. Ameritech Illinois

108   uses the same 271-compliant process used by SWBT for its CLEC customers. As in

109   SWBT states, the OS/DA branding process in Ameritech Illinois is dependent upon

110   completion and posting of service orders to migrate local exchange service from one

111   provider to another. After the service order migration information flows through

112   Ameritech Illinois' operations support systems and is completed and posted, the new

113   carrier information flows down to LIDB. The process is the same whether a subscriber

114   migrates from Ameritech Illinois to a CLEC's local exchange service or from a CLEC to

115   Ameritech Illinois' local exchange service. The most important point is that all callers to

116   Ameritech Illinois' operator platform are treated the same, regardless of the subscriber's

117   local exchange carrier. Subsequent to service order completion and posting, any

118   branding change interval resulting from migration of a subscriber from Ameritech

119   Illinois' local exchange service to a CLEC's resold or UNE-based local exchange service

120   is the same as when a CLEC subscriber migrates to Ameritech Illinois' local exchange

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[3]   A CLEC's brand is "played" when the CLEC has subscribed to Ameritech Illinois' OS/DA wholesale branding offer.

121 service.[4] Branding of OS and DA calls handled by Ameritech Illinois is provided on a

122 nondiscriminatory parity basis.

123

124 III. **CLEC VERIFICATION CAPABILITIES FOR LISTINGS USED IN**
125 **AMERITECH'S DIRECTORY ASSISTANCE DA DATABASE.**
126
127 Q. **Another issue that came up at the industry workshop was whether Ameritech**

128 **Illinois provides CLECs the capability to verify the presence and accuracy of their**

129 **subscribers' directory listings. Is there such a process?**

130 A. Yes. Ameritech Illinois provides CLECs the capability to verify their listings used in

131 Ameritech Illinois' DA database. Both Ameritech Illinois' subscriber listings and CLEC

132 subscriber listings in Ameritech Illinois' DA database flow from the White Page ("WP")

133 database. As detailed in the testimony of Robben Kniffen-Rusu, Ameritech Illinois

134 CLECs have the capability to verify the presence and accuracy of their respective

135 subscribers' listings in the WP database, which then flow to Ameritech Illinois' DA

136 database. To the extent that a CLEC chooses to use the listing verification tools available

137 to it, the CLEC has the capability to verify the presence and accuracy of its subscribers'

138 listings, both in the WP database and in the downstream DA database.

139

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[4] A CLEC might inaccurately argue that customer confusion results during any interval between carrier-to-carrier migration and changes in branding. However, most subscribers rarely use Operator or Directory Assistance services on a daily basis, so it would be unreasonable to conclude that customer confusion results during a short migration interval.

139   **Q.**   **Has the capability to verify CLEC directory listings been approved elsewhere?**

140A.   Yes. The ability to verify listings in the WP database, which "feeds" the DA database,

141   was approved by the FCC in SWBT's section 271 proceedings for Texas, Oklahoma,

142   Kansas, Arkansas and Missouri. Ameritech Illinois provides CLECs a listing verification

143   process that is also 271-compliant.

144

145IV.   **CONCLUSION**

146Q.   **Does Ameritech Illinois fulfill its obligations under sections 251(b)(3) and**

147   **271(c)(2)(B)(vii)(II) and (III) of the Act?**

148A.   Yes. Ameritech Illinois provides CLECs nondiscriminatory access to its OS and DA

149   services and includes CLECs' listings in its DA database on the same basis it does for

150   Ameritech Illinois' retail subscribers.

151

152Q.   **Does this conclude your direct testimony?**

153A.   Yes.

DRAFT

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)
	)
Application by SBC Communications Inc.,	)
Illinois Bell Telephone Company d/b/a	) CC Docket No._____
Ameritech Illinois and Southwestern Bell	)
Communications Services, Inc. d/b/a	)
Ameritech Long Distance for Provision of	)
In-Region InterLATA Services in Illinois	)

AFFIDAVIT OF CHRIS NATIONS
ON BEHALF OF AMERITECH

STATE OF TEXAS	)
	)
COUNTY OF DALLAS	)

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OPERATOR SERVICES/DIRECTORY ASSISTANCE/
DIRECTORY ASSISTANCE LISTINGS
AFFIDAVIT

SUBJECT	PARAGRAPH (S)
LIST OF ILLINOIS CLECS FOR WHICH OS AND/OR DA SERVICES HAVE BEEN PROVIDED BY AMERITECH ILLINOIS	ATTACHMENT A

I, Chris Nations, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND

1. My name is Chris Nations. I am Area Manager – Regulatory –Operator Services. My business address is One SBC Plaza, Room 3440.13, Dallas, Texas 75202. In this position, I am responsible for representing Ameritech Illinois' Operator Services organization before regulatory bodies and other external stakeholders. I also assist these organizations in meeting all legal and regulatory requirements relating to Operator and Directory Assistance Services provided by Ameritech Illinois.

2. I attended the University of Central Arkansas in Conway, Arkansas, where I earned a BA degree in Mass Communications and Marketing in 1994. While working for the Company, I have attended a number of seminars and other training sponsored by SBC Communications, Inc. ("SBC"), and other industry organizations on various management subjects. I began my career with SBC in 1996. I have held account management and product management positions in Southwestern Bell Wireless and Southwestern Bell Telephone. From May 2000 to January 2002, I was employed by SBC Telecom, SBC's out-region CLEC subsidiary. During that time I was responsible for SBC Telecom's

interconnection agreements with ILECs outside the SBC operating territory. I began my

current assignment as Area Manager – Regulatory - Operator Services, February 1, 2002.

EXECUTIVE SUMMARY

3.   The purpose of my affidavit is to demonstrate that the Illinois Bell Telephone Company[1]

("Ameritech") meets its obligations under Section 251 and Section 271(c)(2)(B) checklist

item vii (II) and (III) of the Telecommunications Act of 1996 ("the Act"). As

demonstrated in this affidavit, Ameritech satisfies those requirements by providing non-

discriminatory access to the following:

- Operator Services ("OS"), including adjunct Operator Call Completion Services;[2]

- Directory Assistance ("DA") Services,[3] including DA Call Completion ("DACC");

- Directory Assistance Listings ("DAL") downloads in bulk format with daily updates,[4]

- Direct Access to the DA database.[5]

4.   In addition, Ameritech complies with the Illinois Commerce Commission ("ICC") order[6]

to provide wholesale OS and DA services to CLECs as unbundled network elements.

Ameritech has tariffed those services in sections 7 and 8 of Part 19 of ICC tariff 20.

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[1] Illinois Bell Telephone Company, an Illinois corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications Inc. Illinois Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Illinois" pursuant to assumed name filings with the state of Illinois.

[2] See Appendix OS and Section 4.10 of Appendix Resale in the Level 3 interconnection agreement ("Level 3 ICA"). Also see Section 8 of Part 19 of ICC Tariff 20.

[3] See Appendix DA and Section 4.6 of Appendix Resale in the Level 3 ICA. Also see Section 7 of Part 19 of ICC Tariff 20.

[4] See Appendix DAL in the Level 3 ICA.

[5] See Appendix Direct in the Level 3 ICA.

[6] ICC Docket 96-0486/96-0569, February 17, 1998. The ICC reaffirmed this requirement until Ameritech

BACKGROUND AND CHECKLIST REQUIREMENTS

5.   Section 271(c)(2)(B)(vii) of the Telecommunications Act requires a 271 applicant to provide or offer to provide "nondiscriminatory access to …(II) directory assistance services to allow the other carrier's customers to obtain telephone numbers; and, (III) operator call completion services."[7] The FCC has held that the phrase "nondiscriminatory access to directory assistance and directory listings" means that "the customers of all telecommunications service providers should be able to access each LEC's directory assistance service and obtain a directory listing on a nondiscriminatory basis, notwithstanding: (1) the identity of a requesting customer's local telephone service provider; or (2) the identity of the telephone service provider for a customer whose directory listing is requested." The FCC specifically held that the phrase "nondiscriminatory access to operator services" means that ". . . a telephone service customer, regardless of the identity of his or her local telephone service provider, must be able to connect to a local operator by dialing '0,' or '0 plus' the desired telephone number."[8]

6.   To comply with the statutory nondiscrimination requirement, the 271 applicant must demonstrate that competing providers have access to operator and directory assistance services that is equal in quality to the access the applicant receives itself. The 271

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demonstrates to the Commission that CLECs have the ability to route their OS/DA traffic to their own OS/DA platforms or to those of a third party provider. Order dated October 16, 2001 in Docket 98-0396. The affidavit of Mr. Deere describes the existing option that Ameritech provides to CLECs if they elect to custom route their OS/DA traffic.

[7] 47 U.S.C. §§ 271(c)(2)(B)(vii)(II), (III).

[8] Second Report and Order and Memorandum Opinion and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Interconnection Between Local Exchange Carriers and Mobile Radio Services Providers, 11 FCC Rcd. at 19449, ¶ 112 (1996) ("Second Report and Order"); 47 C.F.R. Section

applicant must also demonstrate that it provides, or is willing to provide, directory assistance listings to competing providers in readily accessible magnetic tapes or electronic formats and to permit competing providers to have access and read the information in the local exchange carrier's ("LEC's") directory assistance database.[9] Where technically feasible, the 271 applicant must also demonstrate that it makes OS and DA branding available to competing carriers.[10]

7.   In demonstrating that Ameritech complies with the nondiscriminatory requirements of checklist item (vii), this affidavit shows that competing carriers may provide operator services and directory assistance for their subscribers by either (a) purchasing Ameritech's services on a wholesale basis, (b) by using their own personnel and facilities, or (c) by routing their subscribers' OS/DA calls to a third-party provider.

8.   This affidavit also demonstrates that competing providers purchasing Ameritech's OS/DA services on a wholesale basis have access to Ameritech's operator and directory assistance services that is equal to Ameritech's access. Additionally, as shown below, CLECs who wish to purchase Ameritech's operator and directory assistance services on a wholesale basis may request Ameritech to brand OS/DA in the CLECs' names.[11]

9.   As mentioned above, Ameritech complies with the ICC order to tariff wholesale OS and DA services as unbundled network elements. In its interconnection agreements, Ameritech's pricing of OS/DA services is in compliance with the FCC's <u>UNE Remand</u>

51.217(c)(2).

[9] 47 C.F.R. § 51.217(c)(3)(ii).

[10] 47 C.F.R. § 51.217(d).

[11] 47 C.F.R. § 51.217(d); <u>Second Report and Order</u>, 11 FCC Rcd at 19463, ¶ 148. For example, when customers call the operator or call for directory assistance, they typically hear a message, such as "thank you for using XYZ

Order, which became effective February 17, 2000. In that order, the FCC found that where incumbent LECs provide customized routing or a compatible signaling protocol, they need not provide access to OS/DA as unbundled network elements.[12]

10. As discussed in the Affidavit of William C. Deere, customized routing is available to CLECs throughout Ameritech's region, including Illinois, and is included in the UNE attachments to various interconnection agreements.[13] CLECs who are providing local exchange service via resold telecommunications or unbundled local switching, thus, can route their subscribers' OS and/or DA calls from Ameritech's end office to their own operator platform or to the operator platform of a third-party OS/DA provider.

11. Competing carriers that wish to provide directory assistance using their own facilities and personnel may obtain Ameritech's directory assistance listings either:

- on a "per query" basis directly to Ameritech's directory assistance database, or

- in a bulk download, with daily updates, to incorporate Ameritech's DA listings ("DAL") into the CLEC's own directory assistance database.[14]

12. Ameritech offers its DAL on a nondiscriminatory basis consistent with the FCC's Second Report and Order, making such listings available on a nondiscriminatory basis.[15] The terms and conditions under which Ameritech makes its DAL available are contained in the Appendix DAL of various interconnection agreements.

Telephone Company." Competing carriers may request the BOC to brand the call with the competitive carrier's name.

[12] Third Report and Order and Fourth Further Notice of Proposed Rulemaking, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 15 FCC Rcd 3696, 3891-92, ¶¶ 441-442 (1999) ("UNE Remand Order"). Ameritech's position is that it provides custom routing using the same signaling protocol that it uses itself to route OS and DA calls from its end offices to its operator platforms.

[13] §14.1.8, Appendix Merger Conditions, §9.3.1, Appendix UNE of the Level 3 ICA.

[14] 47 C.F.R. § 51.217(c)(3)(ii); Second Report and Order, 11 FCC Rcd at 19460-61, ¶¶ 141-44.

DRAFT

AVAILABILITY OF OPERATOR SERVICES AND DIRECTORY ASSISTANCE

13.   CLECs who provide local exchange telephone service through their own end office

switches, and/or through Ameritech's end office switches via resale or unbundled local

switching, have several options in selecting a provider of OS and DA services for their

subscribers. The following briefly outlines the OS and DA service options that

Ameritech, as one wholesale provider, makes available to CLECs on a nondiscriminatory

basis for their subscribers.

14.   CLEC subscribers' OS and DA calls, when local exchange service is provided via

Ameritech's resold telecommunications service or unbundled local switching, are routed

from Ameritech's end offices to Ameritech's operator platforms over the same trunks and

in the same manner and timeframe as Ameritech's subscribers' calls. Calling patterns are

the same for these CLEC subscribers as for Ameritech subscribers.

15.   **Resale Services OS/DA** – Ameritech provides CLECs' subscribers access to Ameritech's

OS and/or DA services ("OS/DA") on the same basis as Ameritech's retail subscribers as

part of Ameritech's resold local telecommunications services.[16] If the resale CLEC

wishes to provide OS/DA services itself or to use a third-party OS/DA provider, the

CLEC may choose to "custom route"[17] its subscribers' OS/DA calls to itself or a third

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[15] Second Report and Order, 11 FCC Rcd 19392, 19567-19580 (Appendix B).

[16] See Sections 4.6 and 4.10 of Appendix Resale in the Level 3 ICA.

[17] Each CLEC has the option to "custom route" OS or DA calls to a platform designated by a CLEC (thus OS/DA services and DA listings are no longer deemed to be unbundled network elements). When a CLEC using Ameritech's resold telecommunications services or unbundled local switching orders customized routing in an end office, the CLEC must decide to which OS/DA provider it wants to route its subscribers' OS/DA calls. If a CLEC elects to custom route its subscribers' OS/DA calls to itself or a third party provider, then all respective calls from the CLEC's subscribers in that end office generally are routed to that provider. However, if the CLEC wishes

7

party provider it designates. Resale CLECs that use Ameritech's OS and/or DA services are billed for OS and DA retail services, minus the appropriate avoided cost discount, on their resale bills. Attachment A to this affidavit lists the resale CLECs that have implemented Ameritech's wholesale OS and DA services.

16. **Providers using unbundled local switching** – CLECs utilizing Ameritech's unbundled local switching can choose Ameritech to provide OS/DA services to their subscribers. A CLEC may also choose to "custom route" its subscribers' OS/DA calls to itself or a third party OS/DA provider. When a CLEC utilizing unbundled local switching chooses Ameritech as its wholesale provider of OS and DA services, Ameritech bills the CLEC the contract rate, or tariffed rate (if applicable), for each OS or DA call or adjunct wholesale service handled by Ameritech.[18]

17. Usage of Ameritech's wholesale OS and DA services by subscribers of UNE-based CLECs are tracked and data is provided to the CLECs in Ameritech's daily usage file. Charges for OS and DA calls are billed to the CLECs via Ameritech's Reseller Billing System.

18. In compliance with the Illinois Commission's order in Docket 96-0486/96-0569, dated February 17, 1998, Ameritech has tariffed its wholesale OS and DA services at TELRIC prices in ICC Tariff 20. OS and DA services are made available at market-based prices in interconnection agreements, consistent with the FCC's UNE Remand Order. Of course,

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Ameritech to handle a specific portion of its OS/DA traffic (i.e. 411, but not 555-1212 local DA calls), Ameritech will negotiate appropriate contract provisions.

[18] See Appendices OS, DA and Pricing of the Level 3 ICA. See also Sections 7 and 8 of Part 19 of ICC Tariff 20.

Ameritech continues to honor the terms, conditions and prices of current, effective Illinois interconnection agreements.

19. **Switch-based providers** -- A CLEC providing local exchange service solely through its own facilities or through a combination of its switch and Ameritech's unbundled loops may choose to route its subscribers' OS/DA calls to Ameritech's platform, to itself, or to a third-party OS/DA provider. Ameritech will negotiate contracts for the provision of either OS or DA services or both, according to the needs of the CLEC. Switch-based CLECs connect to Ameritech's operator switch via direct trunking and are billed their contracted rate:

   - on an operator work-second basis for operator-assisted calls, and

   - on a completed-call basis for fully automated calls.

20. Switch-based CLECs are billed using the same billing process that Ameritech uses with its ILEC customers, via Ameritech's Local Exchange Carrier Services Billing ("LSB") system.

21. Ameritech provides switch-based CLECs with nondiscriminatory access to OS/DA facilities and functionalities by standard trunk interconnections when such a CLEC elects to utilize Ameritech as its OS/DA provider. The CLEC's subscriber can access Ameritech's OS and DA services by dialing 411, home NPA-555-1212 or another dialing code, as determined by the switch-based CLEC. To initiate routing of OS/DA calls to Ameritech, the CLEC orders dedicated trunks to Ameritech's operator switch per the terms of its interconnection agreement with Ameritech. Separate appendices to Ameritech's interconnection agreements allow facilities-based CLECs to choose

Ameritech as their provider of OS and/or DA services.[19] A CLEC can purchase either service or both on a wholesale basis from Ameritech.

22.   If a facilities-based CLEC chooses to use Ameritech as its wholesale provider of OS or DA services, Ameritech agrees to provide the contracted OS or DA services for a minimum period of one year. This one-year period enables Ameritech to forecast its OS and DA call volumes to enable Ameritech to allocate appropriate staffing and equipment resources to serve all callers, including CLECs', incumbent local exchange carriers' ("ILEC") and Ameritech's subscribers in the same time frame (i.e. first in, first served) and in the same accurate and efficient manner as required under Illinois rules.[20]

Directory Assistance Services

23.   The DA services provided by Ameritech to requesting CLECs' subscribers in Illinois are the same services provided to Ameritech's subscribers and include:

*   <u>Directory Assistance</u> provides subscriber listing information name, address and published telephone number (or an indication of "non-published" status) to CLECs' subscribers that dial 411 or home NPA 555-1212. Ameritech's National Directory Assistance Service for non-local listings also is provided to CLECs' subscribers as it is for Ameritech's retail subscribers.[21]

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[19] <u>See</u> Appendices OS and DA of the Level 3 ICA.

[20] Section 730.510 of Illinois Administrative Code Title 83, Chapter I, Subchapter f, <u>Standards of Service for Local Exchange Telecommunications Carriers</u> requires that Ameritech answer all OS and DA calls within 10 seconds.

[21] Ameritech is accessing Ameritech's information storage facility for this incidental interLATA service as required by § 271(g)(4) of the Act.

- Directory Assistance Call Completion completes a local or intraLATA call to the requested number, on behalf of a CLEC's subscriber, utilizing Ameritech's automated voice system or operator assistance.

Operator Services

24. Wholesale Operator Services furnished by Ameritech to requesting CLECs in Illinois are in compliance with the requirements of the Act and FCC regulations and include the same services Ameritech provides to its subscribers:

   - Automated Call Assistance. This service allows the end user to complete a call without the assistance of an operator.

   - Manual Call Assistance. This includes the following types of services:

     ➢ *Operator Assistance* - An end user dials "0" or "0" plus an area code and telephone number and places either station-to-station or person-to-person collect, third number, calling card or sent paid call using an operator's assistance. "Sent paid" calls are those that are billed to the telephone number from which the call is made (*i.e., not billed collect to a third party or calling card*).

     ➢ *Busy Line Verification (BLV)* is a service in which the caller requests that the operator determine whether an access line on Ameritech's network is in use. Often this service is requested if a caller attempts to place a local or intraLATA call on a direct-dial basis and repeatedly reaches a busy signal. The caller dials zero and requests that the operator "check" the line to determine if it is busy. The operator will access Ameritech's verification

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equipment while the calling customer is on "hold." When the operator accesses Ameritech's verification network, a scrambler attaches to the line. The scrambler allows the operator to determine if a conversation exists on the line without interrupting the conversation and without being able to understand what is being said. The scrambler thus protects the parties' privacy. The operator will report the result of the verification attempt to the calling customer.

➤ *Busy Line Verification Interrupt (BLVI)* is a service provided if the caller asks the operator to interrupt a conversation in progress to determine if one of the parties is willing to speak to the caller requesting the interrupt. If the operator detects conversation on a busy line per the procedures outlined above, the caller may request that the operator interrupt that conversation. The caller is again placed on "hold." The operator can then interrupt the conversation in progress. At that time the operator can hear what is being said and the parties on the busy line will also be able to hear the operator. An alerting tone will sound to alert the parties that the operator has accessed the line. Using the calling party's name, the operator will advise of the request that the line be interrupted and ask if the line will be released. The operator will report back to the calling party, who can then dial direct; the operator does not complete the call.

➤ *Operator Transfer Service* is a service in which a CLEC's subscriber dials zero and, at the caller's request, the operator transfers the call to an

interexchange carrier subscribing to Ameritech's Operator Transfer Service, as described in Ameritech's federal FCC Tariff No. 2. Interexchange carriers, thus, complete interexchange calls.

25. In addition to the retail OS and DA services (discussed above) that Ameritech offers to CLECs for their subscribers, Ameritech also provides the following wholesale service for both resale and facilities-based CLECs:

- Call Branding is a wholesale service that enables a CLEC to identify itself audibly and distinctly to its subscribers at the beginning of each OS/DA call handled by Ameritech on the CLEC's behalf.[22] OS and DA calls from switch-based CLECs, like those calls from independent and wireless telephone companies, are delivered to Ameritech's operator switch over separate, dedicated trunks. Therefore Ameritech was able to offer branding of switch-based CLECs' OS and DA calls quickly after passage of the Act. To satisfy the requests of CLECs as well as the branding requirement of FCC rule 47 C.F.R. § 51.217(d) for resellers, Ameritech upgraded its operator platform to make branding capability available to any requesting CLEC in Illinois, including facilities-based carriers that use Ameritech's unbundled local switching as well as resellers of Ameritech's telecommunications services.[23] This feature allows OS and DA calls from subscribers of different carriers (Ameritech and CLECs), combined on the same trunk from Ameritech's end office to its operator switch, to receive the brand of the subscriber's local exchange carrier. Provisions for branding are included in Ameritech's approved interconnection

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[22] 47 C.F.R. § 51.217(d); see Appendices OS and DA and Appendix Resale in the Level 3 ICA.
[23] See Accessible Letter CLECAM00-074, issued August 1, 2000. All accessible letters referenced in this affidavit are available at SBC's website (https://clec.sbc.com).

agreements.[24] Attachment A lists the facilities-based providers and resellers in Illinois to whom Ameritech provides OS and DA branding.

- **Rate/Reference** is a wholesale service that enables Ameritech operators to quote a CLEC's Operator Services rates, provided to Ameritech by the CLEC, to the CLEC's subscribers upon request as required by FCC rules. Ameritech has deployed new technology specifically to enable Ameritech's operators to provide a CLECs' rates at the CLEC subscriber's request, in parity with the service that Ameritech provides to its subscribers. Other services available with Rate/Reference wholesale service are:

  - The ability to provide CLEC subscribers with the CLEC's business office and repair telephone numbers, and

  - CLECs' Time and Cost rate information to end users when the CLEC resells Ameritech's Hotel/Motel service. This service enables Ameritech's operators to provide, to a Hotel/Motel business, the time and charges associated with a call placed by a Hotel/Motel guest (allowing the Hotel/Motel to place the charges on the guest's bills).

26. **Inward Operator Service**[25] includes Line Status Verification and/or Busy Line Interrupt services (described above). These inward wholesale services are available to telephone operators of CLECs and other independent telephone companies that provide their own operator services via their own switches or custom routing. Other providers' operators can access Ameritech's Inward Operator personnel to check a line on Ameritech's network on behalf of the provider's subscribers. Interexchange carriers and other

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[24] See Section 4 of Appendices OS and DA and Section 5.2 of Appendix Resale in the Level 3 ICA.

Operator Services Providers ("OSPs") access the Ameritech Inward Operator service under the terms of Ameritech's Federal Access Tariff. Ameritech makes Inward Operator services available to any CLEC during negotiation or through amendments to existing interconnection agreements.

PROVISION OF WHOLESALE DA SERVICES / PROVISION OF DA LISTINGS IN BULK / DIRECT ACCESS TO DA DATABASE

27.   Ameritech has discrete obligations under the Act, FCC rules and current interconnection agreements to provide nondiscriminatory access to:

- DA services,

- directory assistance listing information in bulk downloads, and

- direct access to Ameritech's DA database.[26]

It is important to understand the distinctions among these terms.

28.   First, as described above, Ameritech provides its DA services on behalf of any CLEC upon request and completion of an effective interconnection agreement. As required by FCC Rule §51.217(c)(3)(i), Ameritech provides CLECs nondiscriminatory access to Ameritech's DA services via Appendix DA and Appendix Resale to an interconnection agreement.[27] Ameritech also offers its wholesale DA service under ICC Tariff 20. This wholesale option may be attractive to a CLEC that chooses not to provide its own DA services, but chooses Ameritech to provide DA services to its subscribers and brand the services as its own.

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[25] See Appendix Inward of the Level 3 ICA.
[26] See Appendix Direct of the Level 3 ICA.
[27] See Appendix DA of the Level 3 ICA.

29. Second, Ameritech provides directory assistance listing information downloads in bulk

format with daily updates directly to a CLEC that chooses to provide its own DA

services. Consistent with the FCC's rule[28] that any telephone customer should be able to

access any listed number of any carrier on a nondiscriminatory basis,[29] Ameritech offers

an agreement whereby the parties exchange DA listing information so that both carriers

will have complete and accurate DA listing databases. Ameritech's DAL are provided at

market-based prices on a per-listing basis. Appendix DAL of various interconnection

agreements provides CLECs and their agents[30] with access to all the directory assistance

listings in Ameritech's DA database, regardless of the identity of the subscriber's

underlying local exchange provider, in compliance with federal rules.[31] A requesting

CLEC receives Ameritech's DA listing downloads on a statewide, geographic area or

class of service basis (business or residence or both) and receives the same listing

information Ameritech's operators access to provide DA service. In compliance with

FCC Rule § 51.217 (c)(3)(ii), CLECs also are offered daily updates that are provided in

the same format as the initial transfer of DA listings provided to the CLEC.

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[28] 47 C.F.R. §51.217(c)(3)(ii).

[29] 47 C.F.R. §51.217(c)(3)(i).

[30] On January 23, 2001, the FCC released an order requiring LECs to make nondiscriminatory access to DAL available not only to CLECs, but to DA providers that are agents of CLECs, or that offer call completion services. See Provision of Directory Listing Information, Under the Telecommunications Act of 1934, As Amended, First Report and Order, FCC 01-27, Docket 99-273. Ameritech already made DAL available to third party DA providers and, thus, already complied with those terms of the FCC's order. In further compliance with the FCC's order, Ameritech stated it would not enforce contract provisions restricting use of DAL, nor would it seek to impose such restrictions on a going forward basis, subject to reconsideration by the FCC or any appeal of the order. See Accessible Letter CLECAM01-080 which can be found at <https:/sbc.clec.com>.

[31] 47 C.F.R.§51.217(c)(3)(ii); Second Report and Order, 11 FCC Rcd at 19460, ¶ 141; Memorandum Opinion and Order, Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, 13 FCC Rcd 20,599, 20,744-46, ¶¶ 248-251 (1998).

30. Third, Ameritech also offers CLECs physical interconnection with direct access, on a query-by-query basis, to the same DA database that is accessed by Ameritech operators for DA purposes. Appendix Direct satisfies the requirement of FCC Rule § 51.217 (c)(3)(ii) by making "read only" access to the information in Ameritech's DA database available to CLECs on a query-by-query basis.[32] While no CLEC has requested Direct Access, connections would be made on an individual case basis and would be implemented upon completion of an effective agreement. Upon receipt of an order from a CLEC for Direct Access, Ameritech would work with the CLEC to activate this service, based on the CLEC's specifications. Direct Access to Ameritech's DA database is priced on an individual case basis, since the technical configuration for this offering would be implemented to accommodate each CLEC customer.

31. Thus, Ameritech makes DA services, DA listings, and direct access to Ameritech's DA database available to CLECs on a nondiscriminatory basis. Additional information about Ameritech's wholesale OS and DA services are included in the Products & Services section of the CLEC Handbook website (https://clec.sbc.com) under 911/OS/DA/Directory Listing.

PERFORMANCE MEASUREMENTS FOR OS AND DA SERVICES

32. Ameritech provides CLEC subscribers nondiscriminatory access to OS and DA services through the same dialing arrangements Ameritech uses for its own customers.[33] As a result, there is no unreasonable dialing delay, as required by §251(b)(3) and the FCC's

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[32] See Appendix Direct in the Level 3 ICA.
[33] 47 C.F.R. § 51.217(c)(2).

rules issued in CC Docket 96-98.[34] Ameritech ensures nondiscriminatory access to OS and DA by processing all calls in the order they are received from all end-users accessing OS or DA (i.e., first in, first served).[35] When an Ameritech operator switch receives electronic notification that an OS or DA call has arrived on a trunk carrying such traffic, it searches for an idle operator position and, as quickly as one is available, connects the call to the position that has been idle the longest. If no operator is available, the call is time stamped and placed in the "calls waiting" queue. When an operator position becomes available, the operator switch searches the calls waiting queue and connects the oldest call to the idle position. Since the operator switch and the calls waiting queue cannot discern any difference among callers – handling every call as first in, first served – subscribers of other carriers inherently receive exactly the same answer performance that Ameritech subscribers receive.

33.   Performance Measurements for OS and DA include the following and are described in more detail in the affidavit of James D. Ehr.

- Directory Assistance Grade of Service

- Directory Assistance Average Speed Of Answer

- Operator Services Grade of Service

- Operator Services Speed Of Answer

- Percentage of Calls Abandoned

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[34] Second Report and Order.
[35] 47 C.F.R. § 51.217(a)(2).

CONCLUSION

34.   Ameritech provides nondiscriminatory access to OS and DA services and its DA listings

pursuant to § 251(b)(3) and 271 (c)(2)(B) of the Act. Ameritech offers ILECs and

CLECs access to the same OS and DA services, in the same time frame, as it does to its

own subscribers. In the event a CLEC chooses to provide its own DA services,

Ameritech negotiates a mutual licensing agreement for exchange of DA listings or

Ameritech can provide direct access to its DA database. On a wholesale basis, Ameritech

provides CLECs with nondiscriminatory access to Ameritech's retail OS and DA

services, including call branding. Ameritech complies with § 251(b)(3) and § 271

(c)(2)(B), item (vii)(II) and (III) of the Act.

35.   This concludes my affidavit.

BEFORE THE

ILLINOIS COMMERCE COMMISSION

On Its Own Motion   )
)
In the Matter of Further Investigation   )   Docket No. 01-0662
Concerning Illinois Bell Telephone Company's   )
Compliance with Section 271 of the   )
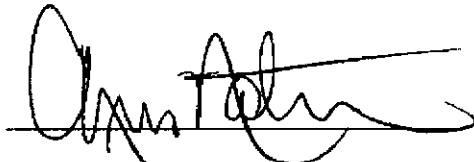Telecommunications Act of 1996   )

AFFIDAVIT OF
CHRIS NATIONS

STATE OF TEXAS   )
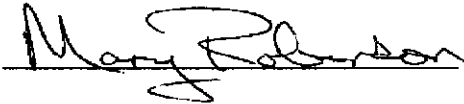   ) SS
COUNTY OF DALLAS   )

The undersigned, being of lawful age and duly sworn on oath, hereby certifies, deposes and states the following:

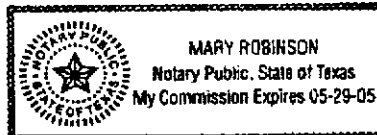> I have caused to be prepared the attached written testimony in support of Ameritech Illinois in the above reference docket. This testimony is true and correct to the best of my knowledge, information, and belief.

Further Affiant sayeth not.

Chris Nations, Affiant

Subscribed and sworn to before me this 13th day of June 2002.

MARY ROBINSON
Notary Public, State of Texas
My Commission Expires 05-29-05

PUBLIC

Illinois Facilities-based CLECs utilizing Ameritech OS/DA Services	
Operator Services	**Directory Assistance**
• OS Branding implemented =15	* DA Branding implemented =16
# OS Rate/Reference implemented = 1	

November 2001 Data

Illinois Resale CLECs utilizing Ameritech Operator Services and Directory Assistance Services				
			*CLEC branding implemented = 1	
			# CLEC Rate/Reference implemented = 1	

November 2001 DATA